

LUKE A. BUSBY, ESQ
Nevada Bar No. 10319
LUKE ANDREW BUSBY, LTD.
316 California Ave # 82
Reno, Nevada 89509
O: 775.453.0112

luke@lukeandrewbusbyltd.com
Designated Resident Nevada Counsel for Plaintiff

Sarah Grady*
Loevy & Loevy
311 N. Aberdeen St., 3rd Fl.
Chicago, IL 60607
O: 312.243.5900
sarah@loevy.com

David B. Owens*
Loevy & Loevy
100 S. King St., St. 100
Seattle, WA 98104
O: 312-243-5900
david@loevy.com

*Verified petitions for permission to practice forthcoming
*Counsel for Plaintiff Craig Farah, Personal Representative
of the Estate of Nicholas Farah*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

CRAIG FARAH, Personal
Representative of the ESTATE OF
NICHOLAS FARAH.

Plaintiff.

vs.

No. 2:20-cv-00604

LAS VEGAS METROPOLITAN
POLICE DEPARTMENT; RICHARD
NEWMAN; SAMUEL MENDOZA;
AARON MOSELY; JEREMY
STEWART; CHRISTY SNAPP;
GABRIEL VILLANUEVA; KIM SOFFE;
and COLLIN PETRIELIUS.

Defendants.

**PLAINTIFF'S UNOPPOSED
MOTION FOR LEAVE TO FILE
INSTANTER VERIFIED PETITION
FOR DAVID OWENS AND MOTION
FOR EXTENSION OF TIME TO
FILE VERIFIED PETITION FOR
SARAH GRADY**

Now comes Plaintiff, Craig Farah, as Personal Representative of the Estate of Nicholas Farah, by and through his undersigned counsel, and respectfully requests that this Court permit Plaintiff's attorney, David Owens, leave to file his verified petition for permission to practice in this case *instanter*. Plaintiff further

1 requests an extension of time to June 11 to file Sarah Grady's verified petition for
2 permission to practice in this case. In support of his requests, Plaintiff states as
3 follows:

4 1. Plaintiff has filed a 42 U.S.C. § 1983 lawsuit against the Las Vegas
5 Metropolitan Police Department and others over the death of his son, Nicholas
6 Farah, at the Clark County Detention Center (CCDC) on March 31, 2019. Dkt. 1.

7 2. Plaintiff is represented in this lawsuit by David Owens and Sarah
8 Grady at Loevy & Loevy, a civil rights law firm headquartered in Chicago. They are
9 not licensed to practice law in the State of Nevada, but are working with the
10 undersigned as Designated Resident Nevada Counsel for Plaintiff.

11 3. This Court previously ordered counsel to file verified petitions by May
12 16, 2020. Dkt. 3. Unfortunately, because of difficulties due to the COVID-19
13 pandemic, and uncertainty regarding counsel's ability to obtain the required
14 notarization of the verified petitions while under stay-at-home orders, counsel was
15 unable to file their petitions by the May 16 deadline.

16 4. Counsel has since resolved these issues, and been able to begin
17 completing the verified petitions. Accordingly, Plaintiff has attached to this motion
18 the required verified petition for permission to practice in this case for David
19 Owens. Ex. A.

20 5. Unfortunately, Sarah Grady's verified petition is not yet complete, as
21 she is still waiting to receive a certificate of good standing from the State of New
22 York, one of the two states where she is licensed to practice law. Accordingly,
23 Plaintiff respectfully requests a brief extension of time, up to and including June 11,
24 to provide Ms. Grady's verified petition.

25 6. Counsel for Plaintiff has conferred with counsel for the Defendants
26 (excepting Defendant Collin Petrielius who has not yet been served). Counsel for
27 Defendants report that they do not oppose Plaintiff's request.

28

1 WHEREFORE, Plaintiff respectfully requests that this Court permit
2 Plaintiff's attorney, David Owens, leave to file his verified petition for permission to
3 practice in this case *instanter*, and to permit Plaintiff's attorney, Sarah Grady, a
4 brief extension of time to June 11 to file her verified petition for permission to
5 practice.

6 Dated: May 28, 2020

7 Respectfully submitted,

8 CRAIG FARAH

9 By: /s/ Luke A Busby
10 Designated Resident Nevada Counsel
for Plaintiff

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15 Designated Resident Nevada Counsel for Plaintiff

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david@loevy.com

19 *Verified petitions for permission to practice forthcoming
Counsel for Plaintiff Craig Farah, Personal Representative
20 of the Estate of Nicholas Farah

21
22 **CERTIFICATE OF SERVICE**

23 I, Luke A. Busby, an attorney, hereby certify that on May 27, 2020, I filed
the foregoing via CM/ECF, which effected service on all counsel of record. I further
24 certify that I will ensure that Defendant Collin Petrielius receives a copy of the
foregoing at the time that he is served with notice of this lawsuit pursuant to Rule 4
25 of the Federal Rules of Civil Procedure.

26
27 /s/ Luke A Busby
28 Designated Resident Nevada Counsel
for Plaintiff

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 2 Nevada Bar No. 10319
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luke@lukeandrewbusbyltd.com

Designated Resident Nevada Counsel for Plaintiff

5 Sarah Grady* David B. Owens*
 6 Loevy & Loevy Loevy & Loevy
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 Chicago, IL 60607 Seattle, WA 98104
 8 O: 312.243.5900 O: 312-243-5900
 sarah@loevy.com david@loevy.com

9 *Verified petitions for permission to practice forthcoming
 10 *Counsel for Plaintiff Craig Farah, Personal Representative
 of the Estate of Nicholas Farah*

11 **IN THE UNITED STATES DISTRICT COURT**
 12 **FOR THE DISTRICT OF NEVADA**

13 CRAIG FARAH, Personal
 14 Representative of the ESTATE OF
 NICHOLAS FARAH,

15 Plaintiff,

16 vs.

17 LAS VEGAS METROPOLITAN
 18 POLICE DEPARTMENT; RICHARD
 19 NEWMAN; SAMUEL MENDOZA;
 AARON MOSELY; JEREMY
 STEWART; CHRISTY SNAPP;
 GABRIEL VILLANUEVA; KIM SOFFE;
 20 and COLLIN PETRIELIUS,

21 Defendants.

22 No. 2:20-cv-00604

23
 24
 25 **PLAINTIFF'S LIST OF EXHIBITS**
 26 **FOR UNOPPOSED MOTION FOR**
 27 **LEAVE TO FILE INSTANTER**
 28 **VERIFIED PETITION FOR DAVID**
 OWENS AND MOTION FOR
 EXTENSION OF TIME TO
 FILE VERIFIED PETITION FOR
 SARAH GRADY

No.	Description
A	David Owens Verified Petition

1 Dated: May 28, 2020

2 Respectfully submitted,

3 CRAIG FARAH

4 By: /s/ Luke A Busby
5 Designated Resident Nevada Counsel
6 for Plaintiff

LUKE A. BUSBY, ESQ
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Reno, Nevada 89509
O: 775.453.0112

9 luke@lukeandrewbusbyltd.com

10 Designated Resident Nevada Counsel for Plaintiff

11 Sarah Grady*
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15 *Verified petitions for permission to practice forthcoming
Counsel for Plaintiff Craig Farah, Personal Representative
of the Estate of Nicholas Farah

17 18 CERTIFICATE OF SERVICE

19 I, Luke A. Busby, an attorney, hereby certify that on May 27, 2020, I filed
20 the foregoing via CM/ECF, which effected service on all counsel of record. I further
certify that I will ensure that Defendant Collin Petrielius receives a copy of the
foregoing at the time that he is served with notice of this lawsuit pursuant to Rule 4
21 of the Federal Rules of Civil Procedure.

23 /s/ Luke A Busby
24 Designated Resident Nevada Counsel
25 for Plaintiff

Exhibit A

Verified Petition of David Owens

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Craig Farah, Personal Representative of the
Estate of Nicholas Farah

Plaintiff(s),

vs.

LVPMD, et al.,

Defendant(s).

Case #20-cvcv-604

**VERIFIED PETITION FOR
PERMISSION TO PRACTICE
IN THIS CASE ONLY BY
ATTORNEY NOT ADMITTED
TO THE BAR OF THIS COURT
AND DESIGNATION OF
LOCAL COUNSEL**

FILING FEE IS \$250.00

David Owens, Petitioner, respectfully represents to the Court:
(name of petitioner)

1. That Petitioner is an attorney at law and a member of the law firm of

Loevy & Loevy

(firm name)

with offices at 100 S. King Street #100-748,
(street address)

Seattle

Washington

98104

(city) (state)
312-243-5900, david@loevy.com
(area code + telephone number) (Email address)

2. That Petitioner has been retained personally or as a member of the law firm by

Plaintiff, Craig Farah

to provide legal representation in

the above-entitled case now pending before this Court

7 4. That Petitioner was admitted to practice before the following United States District
8 Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts
9 of other States on the dates indicated for each, and that Petitioner is presently a member in good
10 standing of the bars of said Courts.

	Court	Date Admitted	Bar Number
11	State of California	1/13/2011	275030
12	State of Washington	9/5/2018	53856
13	7th Circuit Court of Appeals	5/11/2011	none
14	US District Court for the ND Illinois	5/9/2013	none
15	US District Court for the ND Indiana	1/11/2013	none
16	US District Court for the CD Illinois	7/18/2014	none
17	US District Court for the ND Ohio	1/25/2015	none
18	US District Court for the WD Wisconsin	8/7/2015	none
	US District Court of ED Wisconsin	6/23/2017	none
	US District Court for the SD Texas	11/23/2015	none
	Central District of California	1/14/2016	none
	Western District of Washington	9/5/2018	none
	5th Circuit Court of Appeals	10/30/2018	none
	9th Circuit Court of Appeals	9/26/2018	none

19 5. That there are or have been no disciplinary proceedings instituted against petitioner,
20 nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory
21 or administrative body, or any resignation or termination in order to avoid disciplinary or
22 disbarment proceedings, except as described in detail below:

none

1 6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give
2 particulars if ever denied admission):

3 none
4
5

6 7. That Petitioner is a member of good standing in the following Bar Associations.

7 none
8
9

10 8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 11-2
11 (formerly LR IA 10-2) during the past three (3) years in the following matters: (State "none" if no applications.)

Date of Application	Cause	Title of Court Administrative Body or Arbitrator	Was Application Granted or Denied
8/26/2016	Woods v. Reno	US District Court of NV	Granted
8/28/2019	Lobato v. LVMPD	US District Court of NV	Granted

19 (If necessary, please attach a statement of additional applications)

20 9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the
21 State of Nevada with respect to the law of this state governing the conduct of attorneys to the same
22 extent as a member of the State Bar of Nevada.

23 10. Petitioner agrees to comply with the standards of professional conduct required of
24 the members of the bar of this court.

25 11. Petitioner has disclosed in writing to the client that the applicant is not admitted to
26 practice in this jurisdiction and that the client has consented to such representation.

27

1 That Petitioner respectfully prays that Petitioner be admitted to practice before this Court
2 FOR THE PURPOSES OF THIS CASE ONLY.

STATE OF washington)
COUNTY OF King)

~~Petitioner's signature~~

David B. Owens, Petitioner, being first duly sworn, deposes and says:

8 That the foregoing statements are true.

0 Subscribed and sworn to before me this

26th day of May, 2020

Petitioner's signature

Notary Public or Clerk of Court
Tiamah D. Erickson, notary public



**DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO
THE BAR OF THIS COURT AND CONSENT THERETO.**

Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner believes it to be in the best interests of the client(s) to designate Luke Busby
(name of local counsel), Attorney at Law, member of the State of Nevada and previously admitted to practice before the above-entitled Court as associate resident counsel in this action. The address and email address of said designated Nevada counsel is:

316 California Ave #82
(street address)

Reno _____, Nevada _____, 89509 _____
(city) (state) (zip code)

775-453-0112, luke@lukeandrewbusbyltd.com.
(area code + telephone number) (Email address)

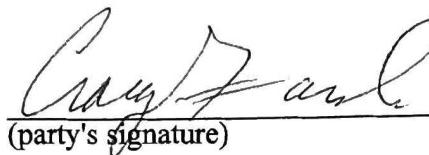
1 By this designation the petitioner and undersigned party(ies) agree that this designation constitutes
2 agreement and authorization for the designated resident admitted counsel to sign stipulations
3 binding on all of us.

4

5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

6

7 The undersigned party(ies) appoint(s) Luke A. Busby as
8 (name of local counsel)
his/her/their Designated Resident Nevada Counsel in this case.

9  5-27-2020
10 (party's signature)

11 Craig Farah, Plaintiff
12 (type or print party name, title)

13 _____
14 (party's signature)

15 _____
16 (type or print party name, title)

17 **CONSENT OF DESIGNEE**

18 The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

19 
20 Designated Resident Nevada Counsel's signature
21 10319 luke@lukeandrewbusbyltd.com
22 Bar number Email address

23 APPROVED:

24 DATED this 18th day of June, 2020.

25

26

27

28 
RICHARD F. BOULWARE, II
United States District Judge

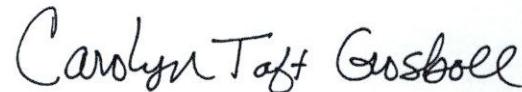
Certificate of Admission To the Bar of Illinois

I, Carolyn Taft Grosboll, Clerk of the Supreme Court of Illinois, do hereby certify that

David Benjamin Owens

has been duly licensed and admitted to practice as an Attorney and Counselor at Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on 05/09/2013 and is in good standing, so far as the records of this office disclose.

IN WITNESS WHEREOF, I have hereunto
subscribed my name and affixed the
seal of said Court, this 8th day of
April, 2020.



Clerk,
Supreme Court of the State of Illinois



The Honorable
Supreme Court of California
JORGE E. NAVARRETE
Clerk and Executive Officer of the Supreme Court

**CERTIFICATE OF THE CLERK OF THE SUPREME COURT
OF THE
STATE OF CALIFORNIA**

DAVID BENJAMIN OWENS

I, JORGE E. NAVARRETE, Clerk/Executive Officer of the Supreme Court of the State of California, do hereby certify that DAVID BENJAMIN OWENS, #275030, was on the 3rd day of January 2011, duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.

*Witness my hand and the seal of the court
on the 21st day of February 2020.*

JORGE E. NAVARRETE
Clerk/Executive Officer of the Supreme Court

By: 
C. Wong, Senior Deputy Clerk

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

I, Susan L. Carlson, Clerk of the Supreme Court of the State of Washington, hereby certify

DAVID B. OWENS

was regularly admitted to practice as an Attorney and Counselor at Law in the Supreme Court and all the Courts of the State of Washington on August 10, 2018, and is now and has continuously since that date been an attorney in good standing, and has a current status of active.



IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of said Court this 31st day of January, 2020.


Susan L. Carlson
Supreme Court Clerk
Washington State Supreme Court